



ROY A. MURA
SCOTT D. STORM
KRIS E. LAWRENCE
JERRY MARTI
SCOTT D. MANCUSO
RYAN M. MURA
BRENDAN S. BYRNE
HEATHER R. BURLEY

LEGAL ASSISTANT
DOREEN A. WATSON

TRACEY J. EPSTEIN
Of Counsel

December 3, 2020

VIA ECF ONLY

United States Magistrate Judge Barbara Moses
Southern District of New York

Re: *Stanislaw Koczwara v. Nationwide General Insurance Company*
Civil Action No.: 1:20-cv-02579-JGK
Our File No. : 8561

Dear Hon. Barbara Moses:

Our firm represents Nationwide General Insurance Company in this case.

The parties herein jointly request a general 30-day-extension of the discovery deadlines.

Discovery is reasonably progressing and counsel for the parties have conferred and agree that additional time will be beneficial to both parties. The plaintiff has conducted the deposition of the Nationwide Claims Manager, Michael Zerby on November 24th. Nationwide's two non-party depositions are scheduled for December 7th and are expected to proceed on that date. The plaintiff will be conducting his second deposition of a Nationwide representative, which is in the process of being scheduled and he is also working on responding to Nationwide's document demands. The plaintiff has extended a settlement demand to Nationwide, which utilizes a committee process for such considerations, and the earliest I am able to schedule the necessary conference is December 10th.

For these reasons, among others, counsel for the parties jointly request a general 30-day extension of the current deadlines set forth in this Courts October 30, 2020, Order as follows:

- all fact discovery to be completed by January 11, 2021;

MURA & STORM, PLLC

United States Magistrate Judge Barbara Moses

December 3, 2020

Page 2

- expert disclosure by February 11, 2021;
 - rebuttal reports by March 11, 2021;
 - expert depositions by March 22, 2021;
- close of discovery March 22, 2021;
- summary judgment motions by April 23, 2021;
- status conference March 25, 2021 at 10:00 a.m.; and
- a joint status letter to be submitted to the Court by March 23, 2021.

Thank you for your attention to this respectfully submitted request.

Very truly yours,

MURA & STORM, PLLC

A handwritten signature in black ink, appearing to be 'S. Storm', with a stylized, sweeping flourish extending to the right.

Scott D. Storm

SDS/kb

cc: Jack Glanzberg, Esq.